

IN THE UNITED STATE BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN RE:)
)
DOROTHEA OLLIE) Case No. B-04-81546C-13D
)
Debtor.)

MOTION TO AMEND PLAN

The debtor, through counsel, respectfully shows unto the Court as follows:

1. The debtor's plan was confirmed to require a twenty-five (25) percent dividend to unsecured creditors.
2. Due to an increase in the debtor's mortgage payment, she has been advised by the Standing Trustee that her monthly plan payment must increase from \$2,875.00 to \$3,060.00 in order to satisfy the confirmed dividend.
3. The debtor is self employed and has been struggling to pay the current plan payment and other necessities of life.
4. The increase in the monthly plan payment would impose an undue, if not impossible, hardship in the debtor.
5. Upon information and belief, if the dividend to unsecured creditors were reduced to ten (10) percent, the increase in the plan payment would not be necessary and the plan would be completed in the required time.

WHEREFORE, the debtor prays that her plan be amended to reduce the dividend to unsecured creditors to ten (10) percent, and for such other and further relief as to the Court may seem just and proper.

Respectfully submitted, this the 29th day of February, 2008.

S/John W. Wall, Jr.

John W. Wall, Jr., Attorney for Debtor
604 Green Valley Road, Suite 210
Greensboro, North Carolina 27408
Telephone: (336) 274-2343
NC State Bar No. 6427

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing MOTION TO AMEND PLAN was served on all interested parties by mailing a copy thereof by first-class mail, postage prepaid, addressed as follows:

Dorothea Ollie
2614 Lincoln Street
Durham, North Carolina 27707

Richard M. Hutson II, Standing Trustee
Chapter 13 Office
Post Office Box 3613
Durham, North Carolina 27702-3613

Bank of America/Nationsbank
Post Office Box 2278
Norfolk, Virginia 23501-2278

Director of Internal Revenue
Special Procedures Section
320 Federal Place, Room 335
Greensboro, North Carolina 27401

ECMC
Lockbox 8682
Post Office Box 75848
St. Paul, Minnesota 55175-0848

National Capital Management

Successor/Aegis Auto Funding
8245 Tournament Drive, Suite 230
Memphis, Tennessee 38125

NC Department of Revenue
Bankruptcy Unit/Office Service Division
Post Office Box 1168
Raleigh, North Carolina 27602-1168

Saxon Mortgage Services, Inc.
4708 Mercantile Drive North
Ft. Worth, Texas 76137

Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Ft. Mill, South Carolina 29715

This the 29th day of February, 2008.

S/John W. Wall, Jr.
John W. Wall, Jr., Attorney for Debtor